



# **Draft SEIS for the Proposed Military Relocation to Guam Comment Response Meeting**

**U.S. Department of the Interior**

4 Nov 2014

# Agenda

**Opening remarks and introductions**

**Major Topics**

**Wrap-up and Closing Remarks**

# Agenda – Major Topics

- Guam National Wildlife Refuge – General Comments
- GNWR – Ritidian Unit
- GWNR – Overlay Lands
- GWNR – Turtle and Coral Habitat
- Green and Hawksbill Turtles
- Critical Habitat Closures
- Critical Habitat Mitigation
- Limestone Forest and Hayunlagu Trees
- Migratory Bird Treaty Act Enforcement
- Ritidian Unit Birds
- Mariana Fruit Bat
- Multi-Species Barrier
- Tree Snail and Butterfly
- Brown Tree Snake and Biosecurity
- Lead Poisoning
- Public Use and Environmental Education
- Cultural and Archaeological Resources
- Programmatic Agreement/Adaptive Management Framework
- Noise Impacts
- Noise Impacts on GNWR Habitat
- Socioeconomics
- Marine Transportation
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- Marine Biological Resources
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- Visual Resources
- Recreational Resources
- 2012 Roadmap Adjustments
- LFTRC
- Tinian
- Finegayan Impacts
- Cumulative Impacts
- Mitigation Considerations

# DOI Brief Overview

## **Comments provided from the following agencies:**

- United States Fish and Wildlife Service
- National Park Service
- United States Geological Survey
- United States Office of Insular Affairs

## Color Explanation

- Blue Text: legal vetted/clean
- Red Text: outstanding questions
- Black text – pulled in from FSEIS V2 Appendix G and needs to be cross-check with the latest CRM (i.e. the version available after the FSEIS V2 TT.)

# Guam National Wildlife Refuge and Critical Habitat

## Summary of DOI Concern:

(Comment ID-925:ABO)

- The NWF LFTRC alternative would significantly and irreversibly affect the mission, operations, and public use of the Guam National Wildlife Refuge (GNWR) and as written in the Draft SEIS, the preferred alternative would not be legal

(Comment ID - 925:G)

- Closures will likely compromise recovery, research, monitoring, and public education actions at the Refuge and would preclude the USFWS from carrying out its mission.

## Summary of DON Response:

(Comment ID-925:ABO)

- *The area would remain functional to serve its intended conservation role for listed and at-risk species. DON and the USFWS will enter into an agreement that allows the establishment of a surface danger zone over the Ritidian Unit to ensure sensitive resources are appropriately protected and managed*

(Comment ID - 925:G)

- *Access to Refuge Lands will be granted at approved times such as when lands are not being used for military training [...] the area would remain functional to serve its intended conservation role for listed and at-risk species [...] the DON and the USFWS will enter into an agreement that provides for the management of the Ritidian Unit to ensure sensitive resources are appropriately protected and managed.*

# Guam National Wildlife Refuge

## Summary of DOI Concern:

(Comment ID - 925:V)

- The potential indirect effects of the proposed actions, which would have significant adverse effects that could directly impact cultural and natural resources on Guam. The analysis is limited particularly in regards to cumulative impacts with other proposed large-scale undertakings by the DoD in the Mariana Islands, not adequately being discussed
  - Adverse impacts from the NWF LFTRC and its SDZ to the GNWR, including cultural and archaeological resources

## Summary of DON Response:

- *The SEIS discusses adverse impacts to the refuge operations under Socioeconomic Resources, Section 5.5.15, additional analysis has been added to Section 5.5.10 on the historic properties at the refuge to acknowledge that the impacts would be significant and cumulative impacts to historic properties on Guam are discussed in Chapter 7*
- *Should the NWF LFTRC (Alternative 5) be selected in the Record of Decision, much of the currently publically accessible areas of Ritidian Unit and cultural properties at Ritidian Unit would be outside range SDZs, and access would still be available via a proposed new beach access adjacent to relocated USFWS buildings*
- *For the areas under the SDZs, when the ranges are not in use, access will be granted consistent with GNWR rules*
- *DON recognizes the importance of access to cultural sites on DoD lands and is developing a plan that balances operational needs, public safety concerns*

# Guam National Wildlife Refuge

## Summary of DOI Concern:

(Comment ID - 925:Z)

- The NPS has concerns of indirect impacts to wildlife and extirpated native species caused by the implementation of the preferred alternative as a result of the conversion of over 1,250 of Overlay Refuge

## Summary of DON Response:

- *Under the preferred alternative, there will remain on Guam sufficient recovery habitat as defined by the FWS to ensure the future recovery of the endangered species, including those which are currently extirpated*
- *The potential reintroduction of extirpated native species onto NPS lands is under the control and authority of the NPS*
- *The potential for the critical habitat to be proposed and designated by the U.S. Fish and Wildlife Service on Guam is outside the scope of the SEIS and a matter under that agency's responsibility*
- *The SEIS must examine the current affected environment and determine the potential impacts of the proposed action on existing conditions, not on the potential for future land use designations*
- *In addition, whether critical habitat will be proposed in reaction to the current proposed action or as a result of any previous actions on Guam is outside the purview or scope of the current analysis. If the U.S. Fish and Wildlife Service does propose critical habitat before the issuance of the Final SEIS and Record of Decision, then the DON will revisit the NEPA process as well as Section 7 consultation under Endangered Species Act to address the potential occurrence of proposed critical habitat on DoD lands affected by the proposed action*

# GNWR - Overlay Lands Impacts and Mitigation

## **Summary of DOI Concerns:**

(Comment ID - 925:A)

- Impacts to the GNWR Overlay lands - Lands designated for ungulate exclusion and forest enhancement mitigation under the ISR/Strike BO in 2007 and the JGPO BO in 2010. Any mitigation for these lands must address both the loss of the current mitigation role these lands play as well as any habitat loss resulting from implementation of the preferred alternative

## **Summary of DON Responses:**

- *DON is revising the conservation measures to avoid and minimize impacts to resources with implementation of the current proposed action/preferred alternative. The specific commitments made in the previous 2010 Biological Opinion will be replaced with those conservation measures identified in the new Biological Opinion addressing the current proposed action*

# GNWR - Overlay Lands Impacts and Mitigation

## Summary of DOI Concerns:

(Comment ID - 925:AC)

- Indirect impact to park wildlife and to potential restoration of extirpated native species caused by the preferred Alt. 5 for LFTRC development which would cause conversion of 255 acres of Overlay Refuge land previously used for endangered species. This would also impact 196 acres of fruit bat, Marianas Crow and Guam kingfisher recovery habitat. These endangered native species once lived in NPS habitats and are hoped to be re-introduced after invasive snake control advances

## Summary of DON Response:

- *The potential restoration of extirpated native species onto NPS lands is under the control and authority of the NPS and impacts to non-adjacent DoD lands from the proposed action would have no impact on the current or future potential for NPS lands to support the reintroduction of any species on NPS lands. To facilitate the potential reintroduction of extirpated species onto NPS lands, the necessary funding, brown treesnake suppression/removal, etc. is the responsibility of the National Park Service and DoD actions would not impact those actions taken by National Park Service on their lands*

# Critical Habitat Mitigation

## Summary of DOI Concerns:

(Comment ID - 925:H)

- The USFWS does not consider the proposed mitigation sufficient to alleviate impacts to critical habitat and to current and planned recovery efforts

## Summary of DON Response:

- *Access will be granted at approved times such as when lands are not being used for military training [...] the area would remain functional to serve its intended conservation role for listed and at-risk species [...] the DON and the USFWS will enter into an agreement that provides for the management of the Ritidian Unit to ensure sensitive resources are appropriately protected and managed* (J.S.: We may need to revise this by Final SEIS publication if the NDAA is passed.)

# Green and Hawksbill Turtles

## Summary of DOI Concerns:

(Comment IDs - 925:AAW and 925:AAY)

- Impacts to the endangered and threatened sea turtles which are dependent on the Ritidian beaches as a major nesting habitat and restriction on access to most important areas of endangered sea turtle nesting at Ritidian the SDZ, preventing any technicians or biologists, whether refuge or DoD ordnance trained staff, from monitoring and protecting nesting females and hatchlings on most days of the year. How can this refuge function be continued with LFTRC use?

## Summary of DON Responses:

- *Restricting access to certain DON land and sea areas at certain times is required to maintain public safety. Impacts associated with reduced or restricted access to specific land and sea areas are acknowledged and evaluated in the SEIS*
- *Final plans concerning access to sites potentially impacted by the proposed action have not been developed [...]*
- *The addition of the LFTRC under Alternative 5 would increase the amount of beach restricted to public access [during range operations] by approximately 10%*
- *Access would still be available via proposed new beach access adjacent to the relocated U.S. Fish and Wildlife Service buildings consistent with established Refuge rules and regulations*

# Limestone Forest and Hayunlagu Tree

## **Summary of DOI Concerns:**

(Comment ID - 925:AAG)

- Impacts from Cantonment Alt. A's removal of 1018 acres of secondary limestone forest and 1.8 acres of primary limestone forest and associated losses of habitat for fruitbats, Mariana crow, Guam kingfisher and *Serianthes*

## **Summary of DON Response:**

- *DON has reinitiated Endangered Species Act section 7 consultation with the U.S. Fish and Wildlife Service and specific mitigation measures and locations have been included in the associated Biological Assessment (Appendix X of the Final SEIS) addressing impacts with implementation of the preferred alternative*

# Migratory Bird Treaty Act Enforcement

## **Summary of DOI Concerns:**

(Comment ID - 925:B)

- One of the four purposes for establishing the Ritidian Unit of the GNWR is for use as an inviolate sanctuary, or for other migratory bird management purposes and preferred alternative poses impacts to the ability of the USFWS to protect and manage species under the MBTA

## **Summary of DON Response:**

- *With appropriate coordination and in accordance with DoD security protocols, the DON currently allows research and monitoring of biological resources by local, university, and federal researchers on Refuge lands*

# Multi-Species Barrier

## Summary of DOI Concerns:

(Comment ID - 925:ABP)

- OIA is concerned about the preferred alternatives impeding the purpose of the multi-species barrier to control BTS at the Refuge

## Summary of DON Response:

- *DON has initiated efforts to reduce the brown treesnake population on Guam more cost-effectively and increase the efficacy of capturing snakes in low density situations [...]*
- *DON has established a comprehensive brown treesnake interdiction program to ensure that military activities, including the transport of civilian and military personnel and equipment to and from Guam, do not contribute to the spread of brown treesnake to other islands or regions*
- *Existing brown treesnake interdiction efforts and associated funding would continue. Any additional interdiction efforts and associated funding required to address the proposed Marine Corps relocation to Guam become part of the DON's brown treesnake interdiction efforts under authority of the Brown Tree Snake Control and Eradication Act*

# Brown Tree snake and Biosecurity

## Summary of DOI Concerns:

- The Draft SEIS provides limited detail on specific biosecurity and brown tree snake interdiction measures. While appreciative of the DON discussion and use of Hazard Analysis and Critical Control Points to minimize invasive species risk, the USFWS believes that additional detail, beyond that presented in Table 2.8-1 is needed about brown tree snake and biosecurity BMPs, in particular on measures talking to the prevention of the spread of the brown tree snake, coconut rhinoceros beetle and little fire ant. The preferred alternative would limit USFWS access and ability to effectively suppress the brown tree snake, within the barrier and as such would set back collaborative efforts between the USFWS and the USGS Brown Tree snake Research Group. (Comment ID - 925:N)
- Access restrictions that setback brown tree snake suppression would adversely impact the reintroduction of native bird and bat species. (Comment ID - 925:W)

# Brown Tree snake and Biosecurity

## Summary of DON Responses:

- Joint Region Marianas has established a comprehensive brown treesnake interdiction program to ensure that military activities, including the transport of civilian and military personnel and equipment to and from Guam, do not contribute to the spread of brown treesnake to other islands or regions [...], as stated in the 2010 Biological Opinion, and the 2014 Biological Assessment for the Re-initiation of Consultation regarding the Proposed Military Relocation to Guam, the DON will fund any increase of current federally funded brown treesnake interdiction measures (in Guam, CNMI, and Hawaii) where the increase is related to direct, indirect and induced growth caused by the U.S. Marine Corps relocation to Guam [...] the area would remain functional to serve its intended conservation role for listed and at-risk species. (Comment ID - 925:N)
- Access to the Ritidian Unit will be granted at approved times such as when the LFTRC is not being used for military training. Upon entering an operational phase, coordination of specific dates for range usage would be scheduled by Range Operations to meet Marine Corps requirements. With appropriate coordination and in accordance with DoD security protocols, the DON would allow research and monitoring of the biological resources on Refuge lands. (Comment ID - 925:W)

# Brown Tree snake and Biosecurity

## Summary of DOI Concerns:

- The Hawaii and Micronesia Biosecurity Plan which is developed because of, and with funding from, the Mariana Islands military build-up environmental impact process, must be discussed and applied throughout many areas of the Final SEIS dealing with terrestrial and marine living resources and the quality of life and economy of Guam. Although BMPs address this in principle, the specific actions from the Hawaii and Micronesia Biosecurity Plan should be noted where appropriate in the Final SEIS. The regular transfer of Guam troops to Tinian or Rota, for example, for training, exposes those islands to invasive species. The threats of impacts on neighboring islands from Guam invasive species is an important issue to be addressed in the Final SEIS. (Comment ID - 925:AI)

# Brown Tree snake and Biosecurity

## Summary of DON Response:

- The Regional Biosecurity Plan (previously called the Micronesia Biosecurity Plan) was initiated in anticipation of original proposed action assessed in the 2010 Guam and CNMI Military Relocation Final EIS. The DON funded the Regional Biosecurity Plan for Micronesia and Hawaii. The Regional Biosecurity Plan provides stakeholders in Micronesia and Hawaii with a platform for coordination and integration of interagency invasive species management efforts. Phase I was completed in 2013, Phase II was completed in 2014. Several recommendations from the Regional Biosecurity Plan have been incorporated into the proposed action (refer to the Biological Assessment in Appendix X of the Final SEIS). In May 2014, a regional workshop was held on Guam that included representatives from various local, federal, and regional jurisdictions to discuss the framework of the document and how each jurisdiction would implement their applicable recommendations within the Regional Biosecurity Plan. (Comment ID - 925:AI)

# Brown Tree snake and Biosecurity

## Summary of DOI Concerns:

- Equally critical is the ability to control the spread of brown tree snakes from Guam to the Commonwealth of the Northern Mariana Islands, Hawaii, and other states and territories where the NPS and other agencies manage public lands for the protection and conservation of native terrestrial species. (Comment ID - 925:X)
- Issues and actions included in the Hawaii and Micronesia Biosecurity Plan need to be discussed in the Final SEIS under terrestrial and marine resources areas. (Comment ID - 925:ABD)

# Brown Tree snake and Biosecurity

## Summary of DON Responses:

- The DON has initiated efforts to reduce the brown treesnake population on Guam more cost-effectively and increase the efficacy of capturing snakes in low density situations [...] DON has established a comprehensive brown treesnake interdiction program to ensure that military activities, including the transport of civilian and military personnel and equipment to and from Guam, do not contribute to the spread of brown treesnake to other islands or regions. (Comment ID - 925:X)
- The Regional Biosecurity Plan provides stakeholders in Micronesia and Hawaii with a platform for coordination and integration of interagency invasive species management efforts. Phase I was completed in 2013, Phase II was completed in 2014. Several recommendations from the Regional Biosecurity Plan have been incorporated into the proposed action (refer to the Biological Assessment in Appendix X of the Final SEIS). In May 2014, a regional workshop was held on Guam that included representatives from various local, federal, and regional jurisdictions to discuss the framework of the document and how each jurisdiction would implement their applicable recommendations within the Regional Biosecurity Plan. The Final SEIS will be updated to reflect the current status of the Regional Biosecurity Plan. (Comment ID - 925:ABD)

# Brown Tree snake and Biosecurity

## Summary of DOI Concerns:

- While the SEIS makes multiple references to the Joint Region Mariana BTS Interdiction Program, specific avoidance, minimization and mitigation actions the DoD will take to support and facilitate research and island-wide BTS control efforts both on and off DoD lands should be included in the SEIS. In addition, the draft SEIS should specify how DoD will coordinate and support BTS control and mitigation in Guam and with partners in other locations that may not have adequate infrastructure or personnel for BTS, Control, mitigation, and research. (Comment ID - 925:ABQ)
- Preferred alternative would limit the USFWS access and ability to effectively suppress the brown tree snake on the Ritidian Unit. (Comment ID - 925:F)

# Brown Tree snake and Biosecurity

## Summary of DON Responses:

- The DON will continue to fund selected research/design projects identified as priorities in the Brown Treesnake Tech Working Group Strategic Plan that are compatible with the military mission on Guam for up to 10 years from the start of the main cantonment construction. (Comment ID - 925:ABQ)
- The Draft SEIS provides an assessment of the potential impacts from noise on resident wildlife and visitors at the Ritidian Unit. Access will be granted at approved times such as when lands are not being used for military training. Upon entering an operational phase, coordination of specific dates for range usage would be scheduled by Range Operations to meet Marine Corps requirements. With appropriate coordination and in accordance with DoD security protocols, the DON would allow research and monitoring of biological resources by local, university, and federal researchers on Refuge lands.

# Brown Tree snake and Biosecurity

## Summary of DOI Concerns:

- The SEIS must include adequate discussions of how the MBP will prevent, detect, mitigate and manage invasive species. As the MBP is not yet completed, the SEIS should include: a realistic timeline for completion of the MBP and implementation of the MBP, as well as identification of interim measures for invasive species. In addition, the SEIS should provide a framework that ensures Federal, state, and territorial cooperation and oversight of MBP implementation. (Comment ID - 925:ABR)
- How will the JRM BTS comprehensive brown tree snake interdiction program address increased staff requirements for ports outside of Guam where materials and personnel will be transiting or originating from to? (Comment ID - 925:ABX)

# Brown Tree snake and Biosecurity

## Summary of DON Responses:

- The Regional Biosecurity Plan provides stakeholders in Micronesia and Hawaii with a platform for coordination and integration of interagency invasive species management efforts. Phase I was completed in 2013, Phase II was completed in 2014. Several recommendations from the Regional Biosecurity Plan have been incorporated into the proposed action (refer to the Biological Assessment in Appendix X of the Final SEIS). In May 2014, a regional workshop was held on Guam that included representatives from various local, federal, and regional jurisdictions to discuss the framework of the document and how each jurisdiction would implement their applicable recommendations within the Regional Biosecurity Plan. The Final SEIS will be updated to reflect the current status of the Regional Biosecurity Plan. (Comment ID - 925:ABR)
- As part of the proposed action, the DON proposes to fund the increase from current federally funded (Department of the Interior and U.S. Department of Agriculture) Brown Tree Snake interdiction measures (in Guam, CNMI, and Hawaii) where the increase is related to direct, indirect and induced-growth caused by the proposed action [...] Existing interdiction efforts and associated funding would continue. Any additional interdiction efforts and associated funding required to address the proposed Marine Corps unit relocation to Guam would become part of the DON's brown treesnake interdiction efforts under authority of the Brown Tree Snake Control and Eradication Act. (Comment ID - 925:ABX)

# Lead Poisoning

## Summary of DOI Concerns:

- There is potential for lead poisoning through direct ingestion of spent lead shot, bullets, or fragments. The Draft SEIS addresses potential concerns regarding lead contamination of water supplies, but does not address the potential for lead poisoning in wildlife on the Ritidian Unit. The Draft SEIS describes BMPs for managing lead at the LFTRC, however, states that there is a potential for some amount of residual lead from spent munitions. The USFWS is concerned that the LFTRC will create a lead poisoning hazard for wildlife, especially shorebirds such as the Pacific golden-plover. Recommendation that the Final SEIS contain a commitment to frequent removal of lead for wildlife frequented areas. (Comment ID - 925:P)

# Lead Poisoning

## Summary of DON Response:

- The purpose of the Range Environmental Vulnerability Assessment program is to identify whether there is a release or substantial threat of a release of munitions constituents (munitions constituents) from the operational range or range complex areas to off-range areas. These programs will use that site-specific data to determine the frequency of monitoring and range clearance, and will include consideration of past and present conditions/usage of areas within the range boundary [...] In addition to lead, which is the indicator munition for small arms ranges, the Final SEIS has been revised to include a discussion of munitions constituents specific to the Hand Grenade Range where explosives are used. The Final SEIS has been revised to include the proposed baseline monitoring and fate and transport modeling of trinitrotoluene (TNT), cyclotetramethylene tetranitramine (High Melting Explosive, HMX), and hexahydro-trinitrotriazine (Royal Demolition Explosive, RDX), and perchlorate. (Comment ID - 925:P)

# Public Use and Environmental Education

## Summary of DOI Concerns:

- The Ritidian Unit provides wildlife dependent recreational opportunities, which may be the most important resource for environmental education on Guam. The proposed SDZ operations, closure schedule, and associated access limitations would prevent the Refuge from accomplishing their conservation missions and providing the public education and access. (Comment ID - 925:S)
- Although refuge administrative facilities, visitor center and access roads would be relocated under implied negotiations between the DOI and the DON on use of the Alt. 5 LFTRC, the endangered fire tree *Serianthes*, habitats supporting endangered species, culturally important natural resources and cultural and archeological sites cannot be relocated. Their use for recreation, education and support of native species will be negatively impacted. (Comment ID - 925:AAV)

# Public Use and Environmental Education

## Summary of DON Responses:

- The DON understands and recognizes the significance of access to the Guam National Wildlife Refuge, including that necessary to promote educational opportunities. (NOTE need to insert Jeff's language regarding the FY15 NDAA once it is clarified by him). Additionally, it should be noted that the public is currently restricted from accessing the majority of the Ritidian Unit of the Guam National Wildlife Refuge by the U.S. Fish and Wildlife Service. The addition of the LFTRC under Alternative 5 would increase the amount of beach restricted to public access [only during the times the ranges are in use] by approximately 10%. Access would still be available via proposed new beach access adjacent to the relocated U.S. Fish and Wildlife Service buildings consistent with established Refuge rules and regulations . What pisses me off about this comment is that FWS leadership has told Hill PSMs that we WILL reach an agreement. This comment counters what DOI HQs has told the Hill. I don't know if we should call them out on that. For the time being I'm sticking with the NDAA language. (Comment ID - 925:S)
- As stated in the Draft SEIS, the DON acknowledges that implementation of LFTRC Alternative 5 at Northwest Field will result in significant impacts to recreation, cultural and biological resources. (Comment ID - 925:AAV)

# Cultural and Archaeological Resources

## Summary of DOI Concerns:

- Areas of cultural significance include Guam's oldest-known and longest-occupied ancient Chamorro settlement site, location of at least six caves, three of which contain the island's oldest-known pictographs and Spanish-era settlement sites including Casa Real, all of which are being protected by the Refuge and are used for cultural and environmental education. Access restrictions would limit these opportunities and programs as well as limiting ongoing cultural research. The closure of the Ritidian Unit would necessitate the relocation of the Visitor's Center, leading to extreme costs and some clearing of designated habitat as would the cost of providing an alternative access road to the beach and other areas. These issues have not been adequately addressed in the Draft SEIS. (Comment ID - 925:T)

# Cultural and Archaeological Resources

## Summary of DON Response:

- DON recognizes and respects the significance of the cultural resources located within the proposed impacted area. Should this alternative be selected in the Record of Decision, consultation on the Range Mitigation Plan would include consideration of concerns such as those identified in your comments. Note that much of the Ritidian Unit currently accessible to the public would be outside range surface danger zones and access would still be available via a proposed new beach access adjacent to the relocated USFWS buildings. For the areas within the surface danger zone, when the ranges are not in use, access would be granted consistent with Guam National Wildlife Refuge procedures established by the FWS for the Ritidian Unit.. Additionally, the DON recognizes the importance of access to cultural sites on DoD lands and has developed an overall Access Plan to facilitate the process of gaining access. Finally, the impacts of establishing an alternative access road to the beach are now addressed in the Final SEIS. (Comment ID - 925:T)

# Cultural and Archaeological Resources

## Summary of DOI Concerns:

- A cantonment development would remove culturally important natural vegetation resources and potentially create direct adverse effects to 24 historic properties and possibly 10 unevaluated structures. How has DoD attempted to avoid these adverse effects? If that is not possible, why not, and how will they be minimized? (Comment ID - 925:AA)
- Preferred Alt. 5 for LFTRC development would cause direct adverse effects to at least 20 historic properties. What mitigation would lessen the impacts? (Comment ID - 925:AD)
- Section 2.8, Table 2.8-1 has no BMPs for Cultural Resources protection. The Final SEIS should include BMPs for Cultural Resources protection or references to how practices will protect Cultural Resources. (Comment ID - 925:AL)

# Cultural and Archaeological Resources

## Summary of DON Response:

- The DON has avoided and minimized impacts to culturally important natural resources and historic properties by working with project planners. This process will continue as project plans are revised and finalized. In addition, project-specific consultation under the 2011 Programmatic Agreement includes efforts to avoid, minimize, and mitigate adverse effects.(Comment ID - 925:AA)
- As per federal law, the DON first tries to avoid and then minimize impacts to historic properties by working with project planners very early in the design stage. In situations where avoidance and/or minimization are not possible due to mission requirements, the mitigation requirements stipulated in the 2011 Programmatic Agreement would be followed.(Comment ID - 925:AD)
- Cultural Resources Awareness training is included in the 2011 Programmatic Agreement as a Best Management Practice to reduce the potential for certain types of adverse effects on historic properties. This training was developed with the participation of the Guam State Historic Preservation Office and is provided to all incoming DoD personnel, their families and contractors. All DoD personnel and contractors will also receive annual briefings. A statement noting this Best Management Practice has been added to the Final SEIS in Chapter 2. (Comment ID - 925:AL)

# Cultural and Archaeological Resources

## Summary of DOI Concerns:

- In section 3.10 on page 3-72, how the PA is used to satisfy Section 106 requirements should be explained. (Comment ID - 925:AV)
- In section 3.11 on page 3-77, Regulatory Framework should also mention the National Natural Landmarks Program which includes Mt. Lamlam, next to the Naval Magazine. (Comment ID - 925:AW)
- Range Mitigation Plan. Is DON already contracting a Range Mitigation Plan for Northwest Field LFTRC under the PA before the Final SEIS and ROD? (Comment ID - 925:AX)
- The direct impacts under NEPA and indirect effects under NHPA are confusing terms. 36 CFR Part 800 requirements must be met for NHPA and could be summarized in section 3.10.3.2. (Comment ID - 925:AY)
- In Table 4.1.10-7, spelling should be “Andersen softball field”. (Comment ID - 925:AAM)

# Cultural and Archaeological Resources

## Summary of DON Responses:

- A description of the Programmatic Agreement process and how it satisfies the Section 106 requirement associated with NEPA is included in section 3.10.3.1, page 3-76 in the Draft SEIS. (Comment ID - 925:AV)
- The National Natural Landmarks Program has been added to Section 3.11.2. (Comment ID - 925:AW)
- The DON will not prepare any range mitigation plans for any alternative until after the Record of Decision is issued.(Comment ID - 925:AX)
- The discussion of "effects", under both NEPA and NHP Programmatic Agreement are discussed in section 3.10.3. Clarification regarding how the requirements of 36 CFR 800 are being met has been added to the same section of the Final EIS. (Comment ID - 925:AY)
- This change has been made to the Final SEIS. (Comment ID - 925:AAM)

# Cultural and Archaeological Resources

## Summary of DOI Concerns:

- A number of possible NRHP eligible structures to be impacted have not been evaluated. Why won't this be done for the Final SEIS? (Comment ID - 925:AAN)
- Although the Draft SEIS indicates that the purpose of the refuge is for the protection of wildlife and living organisms, the NPS shares responsibilities in protecting cultural, archeological and historical sites and features. Some uniquely significant features and traditional cultural properties are found in the areas to be impacted by LFTRC Alt. 5. These include the oldest known settlement site in the Marianas and ancient rock pictographs including ones with star or traditional constellation formations. How will DoD avoid impacting the monitoring, study and educational use of these sites within the SDZ? (Comment ID - 925:AAZ)
- At least 20 NRHP eligible sites are known in the Alt. 5 LFTRC direct impact area. How will DoD avoid restricting access for the public and/or educational, scientific, and traditional use activities? (Comment ID - 925:ABA)

# Cultural and Archaeological Resources

## Summary of DON Responses:

- The 2011 Programmatic Agreement has provisions for inventory and evaluation. All unevaluated resources that would be adversely effected, would be evaluated in consultation with Programmatic Agreement stakeholders and the public under this process prior to initiation of construction work. (Comment ID - 925:AAN)
- Much of the currently publicly accessible areas of Ritidian Unit and cultural properties at Ritidian Unit would be outside range surface danger zones and access would still be available via a proposed new beach access adjacent to relocated U.S. Fish and Wildlife Service buildings. For the areas within the surface danger zones, when the ranges are not in use, access will be granted consistent with Guam National Wildlife Refuge rules. (Comment ID - 925:AAZ)
- The DON will fulfill its responsibility for curation of archaeological collections from DoD lands, consistent with 36 CFR 79 and Stipulation X.C of the 2011 PA. The commitment to request Congressional authorization and appropriation of funding to support a Guam repository is a separate measure to mitigate the cumulative effects of the overall relocation action. Consistent with Stipulation VII.C of the PA, if Congress does not authorize and appropriate this funding, the DON will reinitiate consultation with the parties to the PA to identify alternative mitigation for cumulative effects. (Comment ID - 925:ABA)

# Cultural and Archaeological Resources

## Summary of DOI Concerns:

- At least 49 NRHP eligible sites are known in the Alt. 5 LFTRC indirect impact area. How will DoD avoid restricting access for the public and/or educational, scientific, and traditional use activities? (Comment ID - 925:ABB)
- NAGPRA does not apply to Guam. (Comment ID - 925:ABG)
- The public has raised concern about the loss of and lack of access to historic and cultural sites on Guam and Tinian due to the proposed alternatives. Currently, there are no Best Management Practices (BMPs) in Table 2.8-1 for Cultural Resource protection. Given the direct and potential indirect effects and cumulative impacts on cultural resources, it is appropriate that BMPs be included in the SEIS and added to Table 2.8-1. (Comment ID - 925:ABM)

# Cultural and Archaeological Resources

## Summary of DON Responses:

- Restricting access to certain DoD areas at certain times is required to maintain public safety. It is the intent of DoD to maintain public access to DoD lands that contain historic properties and natural resources of cultural importance consistent with safety and operational requirements. Access will be granted at approved times such as when lands are not being used for military training. DON has developed an access plan to allow public access to cultural sites consistent with operational needs, public safety concerns, and enjoyment of these resources. For the areas under the surface danger zones on Ritidian, when the ranges are not in use, access will be granted consistent with Guam National Wildlife Refuge rules. (Comment ID - 925:ABB)
- The Native American Graves Protection and Repatriation Act has been removed from the list of laws in Chapter 8. (Comment ID - 925:ABG)
- DoD is in the process of developing a Public Access Plan for non-DoD personnel to access DoD lands. Comments from the public were sought for this plan in July, 2014. It is the intent of DoD to maintain public access to DoD lands that contain cultural/historical sites consistent with safety and operational requirements. Access will be granted at approved times such as when lands are not being used for military training. (Comment ID - 925:ABM)

# Cultural and Archaeological Resources

## Summary of DOI Concerns:

- No BMPs are included under the Cultural Resource Protection section. This is concerning as there is acknowledgment that cultural resources will be impacted by proposed activities. BMPs should be included in Final SEIS and description of how such practices will protect, reduce, and mitigate impacts to cultural resources. Cultural Resource Mitigation measures were included in the “Final Mitigation Monitoring and tracking program plan for Guam and CNMI Military Relocation Program” NAVFAC Document and 2011 PA, which may provide as a useful reference in developing Cultural Resource BMPs for inclusion in Final SEIS. (Comment ID - 925:ABY)
- SEIS states that “to the degree possible, impacts to historic properties and other resources of cultural importance would be avoided or minimized during the planning process.” Appropriate to elaborate what specific actions will be taken to address and avoid adverse effects. (Comment ID - 925:ACC)

# Cultural and Archaeological Resources

## Summary of DON Responses:

- Cultural Resources Awareness training is included in the 2011 Programmatic Agreement as a Best Management Practice to reduce the potential for certain types of adverse effects on historic properties. This training was developed with the participation of the Guam State Historic Preservation Office and is provided to all incoming DoD personnel, their families and contractors. All DoD personnel and contractors will also receive annual briefings. A statement noting this Best Management Practice has been added to the Final EIS. (Comment ID - 925:ABY)
- As per federal law, the DON first tries to avoid and then minimize impacts to historic properties by working with project planners very early in the design stage. In situations where avoidance and/or minimization are not possible due to mission requirements, the mitigation requirements stipulated in the 2011 Programmatic Agreement would be followed. Specific avoidance and minimization processes will be developed through the Programmatic Agreement process; however, typically includes construction avoidance and/or customized measures to minimize impacts to be developed on a project by project basis. (Comment ID - 925:ACC)

# Programmatic Agreement/Adaptive Management Framework

## Summary of DOI Concerns:

- The NPS is looking forward to consultation under Section 106 in the development of a new or updated Programmatic Agreement to minimize or mitigate potential adverse effects to historic properties. Similarly, the NPS is please to read that the DoD plans to continue to support the adaptive program management framework developed in the Civil-Military Coordination Council Operating Charter as a cooperative effort to reduce the impacts of the military relocation to Guam.(Comment ID - 925:Y)
- Is the military pursuing other options to obtain authorization for a repository for curation of archaeological collections on Guam? If not, what other plans do they have to fulfill the stipulation in PA to provide such repository? (Comment ID - 925:AB)

# Programmatic Agreement/Adaptive Management Framework

## Summary of DON Responses:

- The 2011 PA establishes an alternate process for reviewing all actions associated with the Marine Corps relocation, including those being assessed in the SEIS. Consistent with guidance from the ACHP, the DON anticipates continuing to implement the 2011 PA to address the relocation action. Supplemental consultation processes are part of the 2011 PA. Additional coordination is being conducted in accordance with the 2011 PA to avoid, minimize, and mitigate impacts on historic properties for the LFTRC preferred alternative. DON looks forward to continuing discussions with DOI on the protection of the cultural resources on Guam.(Comment ID - 925:Y)
- The DON will fulfill its responsibility for curation of archaeological collections from DoD lands, consistent with 36 CFR 79 and Stipulation X.C of the 2011 PA. The commitment to request Congressional authorization and appropriation of funding to support a Guam repository is a separate measure to mitigate the cumulative effects of the overall relocation action. Consistent with Stipulation VII.C of the PA, if Congress does not authorize and appropriate this funding, the DON will reinitiate consultation with the parties to the PA to identify alternative mitigation for cumulative effects. (Comment ID - 925:AB)

# Programmatic Agreement/Adaptive Management Framework

## Summary of DOI Concerns:

- While the Draft SEIS (2.9 Potential Mitigation Measure) states that APM is “no longer required”, OIA maintains that the CMCC will continue to be integral for successful intergovernmental and interagency coordination. While the force posture has been decreased the cumulative effects of individual projects necessary for the buildup may very well require DoD implementing APM. (Comment ID - 925:ABL)
- How will the 2011 PA be updated to incorporate new information and/or the need for new or modified stipulations based on analysis of impacts in the Draft SEIS? Please provide a “cross-walk” table that clearly shows what elements of the 2011 PA remain relevant to projects covered in the 2010 EIS and this SEIS. (Comment ID - 925:AE)

# Programmatic Agreement/Adaptive Management Framework

## Summary of DON Responses:

- The Joint Guam Program Office advised Council on Environmental Quality of its determination that, based on the anticipated significantly reduced pace of construction activity, Adaptive Program Management did not need to be identified as a specific mitigation measure in the SEIS. There were no objections. The DON remains committed to participating fully in the Civil-Military Coordination Council and to consider its advice and recommendations in adjusting the pace and/or sequencing of military construction projects. (Comment ID - 925:ABL)
- The 2011 PA establishes a program alternative for ensuring Section 106 compliance for overall the overall Marine Corps Relocation. The SEIS does not alter DoD's commitments to Guam contained in the PA. The DoN remains committed to seek Congressional authorization and appropriation to support construction of a Guam Cultural Repository. The SEIS does not address actions in the CNMI. The preferred LFTRC alternative at NWF would affect access to cultural sites when ranges are active. Consultation under the 2011 PA, which involves the Guam State Historic Preservation Officer, Consulting Parties, and the public, includes efforts to avoid, minimize, and mitigate adverse effects to historic properties, including indirect adverse effects that may result from reduced access. When the ranges are not in use, public access would be granted consistent with Guam National Wildlife Refuge procedures. (Comment ID - 925:AE)

# Programmatic Agreement/Adaptive Management Framework

## Summary of DOI Concerns:

- As the 2011 PA contains project or area specific mitigation for both Guam and Tinian, language should be included in the Guam SEIS and CJMT EIS to explain which provisions of the PA are maintained and the process of how the PA will be modified and updated relative to the impacts of the respective preferred alternatives. In the 2011 PA, DoD expressed its commitment to providing 24-hour- a- day/seven- day- a- week unimpeded access to Pagat Village and Pagat Caves to avoid, minimize and mitigate impacts on historic properties, how will the same commitment for cultural and historical sites be maintained given the preferred alternative for the Live Fire Training Range Complex (LFTRC)? Further, clarification on how cultural resources of the CNMI will be impacted, as well as when, and under what conditions, and which provisions of the 2011 PA will be implemented as it relates to CNMI proposed activities should be included in the CJMT EIS. (Comment ID - 925:ABN)

# Programmatic Agreement/Adaptive Management Framework

## Summary of DON Response:

- (1) DON recognizes its responsibility to curate archaeological collections in accordance with the standards of 36 CFR 79 and consistent with Stipulation X.C of the Programmatic Agreement. DoD's commitment under Stipulation VII.C to request Congressional authorization and appropriation to transfer DoD funding to another federal agency to support Guam's construction of a Guam curation repository is a separate measure intended to address the cumulative effects of the action. Consistent with Stipulation X.C, DoD will continue to ensure that all archaeological collections are curated appropriately, either in existing facilities, or, if necessary, a new facility constructed on DoD lands. (2) The entirety of the 2011 Programmatic Agreement is "maintained" for actions proposed under the previous EIS and for those that are being reassessed under the SEIS. Actions associated with the CJMT are outside the scope of the proposed action in the SEIS. The preferred alternative at Northwest Field would not impede upon access or historic properties at Pãgat Village and Pãgat Caves. Additional coordination is being conducted in accordance with the 2011 Programmatic Agreement to avoid, minimize, and mitigate impacts on historic properties for the LFTRC preferred alternative. This SEIS does not revisit previous decisions for Ranges on Tinian as proposed under the previous 2010 EIS. (Comment ID - 925:ABN)

# Programmatic Agreement/Adaptive Management Framework

## Summary of DOI Concerns:

- Does the CEQ concur with DON assertion that “Adaptive Program Management is no longer required”? (Comment ID - 925:ABZ)
- Reference to augmentation of SEIS by reviews consistent with the 2011 PA. Can clarification in this section be provided about what elements of the PA are maintained and how updates to the PA will be incorporated based on the impacts of the Draft SEIS? Creating a table in the Final SEIS could provide such clarity on what elements of the 2011 PA are maintained or require augmentation. (Comment ID - 925:ACB)

# Programmatic Agreement/Adaptive Management Framework

## Summary of DON Responses:

- The Joint Guam Program Office advised Council on Environmental Quality of its determination that, based on the anticipated significantly reduced pace of construction activity, Adaptive Program Management did not need to be identified as a specific mitigation measure in the SEIS. There were no objections. The DON remains committed to participating fully in the Civil-Military Coordination Council and to consider its advice and recommendations in adjusting the pace and/or sequencing of military construction projects. (Comment ID - 925:ABZ)
- The 2011 Programmatic Agreement applies to actions proposed under the previous EIS and for those that are being reassessed under the SEIS. Additional coordination is being conducted in accordance with the 2011 Programmatic Agreement to avoid, minimize, and mitigate impacts on historic properties for the LFTRC and cantonment alternatives. DoD is in the process of contacting the original invited parties to re-confirm whether or not they would like to be signatories on the 2011 Programmatic Agreement. Both Guam Preservation Trust and the National Trust for Historic Preservation will be invited to be signatories on the 2011 Programmatic Agreement. (Comment ID - 925:ACB)

# Noise Impacts

## Summary of DOI Concerns:

- Noise impacts from the implementation of the preferred alternative (live-fire operations and aircraft overflights) remain a concern, particularly in regards to impacts to wildlife which are not addressed in the Draft SEIS and would be a significant stressor. Particular wildlife of note include avian species and Marianas fruit bat. (Comment ID - 925:O)
- Noise zone impacts at LFTRC's are said not to be incompatible with land use because of lack of occupied houses in the zones. But other activities such as hiking, picnicking, visitor's organized tours and appreciation of excellent beaches and historic sites would be negatively impacted by LFTRC noises. The Final SEIS must note this. This is especially damaging to the tourism business at private Jinapsan Beach lands. The USGS geologist most knowledgeable on Pacific Island beaches, Dr. David Doan, has described these beaches accessible through Anderson AFB as the best beaches in the Pacific Islands. (Comment ID - 925:AAU)

# Noise Impacts

## Summary of DON Responses:

- The Draft SEIS provides an assessment of the potential impacts from noise on wildlife . Access to the Ritidian Unit will be granted at approved times such as when the LFTRC is not being used for military training. Upon entering an operational phase, coordination of specific dates for range usage would be scheduled by Range Operations to meet Marine Corps requirements. With appropriate coordination and in accordance with DoD security protocols, the DON would allow research and monitoring of the biological resources on Refuge lands. The potential issue of spent munitions entering the nearshore environment is also addressed in the Draft SEIS. (Comment ID - 925:O) *(J.S.: Do we want to add in the language about best available data and the decline by FWS to provide DON access to conduct additional noise measuring and modeling? Also, the ambient noise information was gathered since the Draft SEIS and will be updated in the FSEIS. This information and a citation to where it will be should be included in the response. I think we need to point them to the information in the FSEIS.)*
- Potential noise impacts on recreational resources from the LFTRC are included in the Recreational Resources sections, 5.1.7, 5.2.7, 5.3.7, and 5.4.7. No revisions have been made to the SEIS in response to this comment. (Comment ID - 925:AAU)

# Noise Impacts on GNWR Habitat

## Summary of DOI Concerns:

- GNWR habitat would be subject to elevated noise levels from the LFTRC, negatively impacting resident wildlife and visitors and reducing the likelihood of success of potential reintroductions of special status species. (Comment ID - 925:F)

# Noise Impacts on GNWR Habitat

## Summary of DON Response:

- The Draft SEIS provides an assessment of the potential impacts from noise on resident wildlife and visitors at the Ritidian Unit. Access will be granted at approved times such as when lands are not being used for military training. Upon entering an operational phase, coordination of specific dates for range usage would be scheduled by Range Operations to meet Marine Corps requirements. With appropriate coordination and in accordance with DoD security protocols, the DON would allow research and monitoring of biological resources by local, university, and federal researchers on Refuge lands.

# Socioeconomics

## Summary of DOI Concerns:

- Given the additional demands on physical infrastructure, it is unclear how upgrades and development of new infrastructure will be financed in light of the limited ability of the Government of Guam (GovGuam) to fund necessary infrastructure related to this SEIS and the extent costs will be passed onto civilians paying increased rates. Beyond the cost of bolstered infrastructure, the increased use of infrastructure results in cumulative socio-economic impacts on Guam and CNMI civilian communities. All additional assistance to support public infrastructure will be detailed by the Economic Adjustment Committee. (Comment ID - 925:ABK)
- Recommend inclusion in the table of relevant BMPs that the Civil Military Coordination Council (CMCC) and Council Working Groups (CWG) developed measures/thresholds to avoid or reduce adverse impacts on environment and social services associated with construction activities resulting from the military realignment. (Comment ID - 925:ABW)

# Socioeconomics

## Summary of DON Responses:

- As directed by the Fiscal Year 2014 National Defense Authorization Act, DoD would convene the Economic Adjustment Committee to consider assistance necessary to support the preferred alternative and develop an implementation plan coordinated by all federal agencies. This plan must be submitted to the congressional defense committees as part of a reporting requirement that is due no later than the date of issuance of the Record of Decision. Progress made in this effort will be updated when appropriate given various constraints, which include coordinating the timing of Economic Adjustment Committee planning effort with the timing of the release of the Final SEIS. (Comment ID - 925:ABK)
- ***NOTE TO REVIEWERS: The JV requests guidance from JGPO or Marine Corps to help address this comment.*** Randy provided response to NFP. (Comment ID - 925:ABW) *(J.S.: Randy provided response to NFP.)*

# Socioeconomics

## Summary of DOI Concerns:

- While the IMPLAN model acknowledges the positive effect on Guam's economy of being stimulated by Guam generated economic activity, how does the model account for the cost born by GovGuam to improve infrastructure and address increased staffing requirements for local government services and programs? (Comment ID - 925:ACA)
- Temporary Workforce Housing is described, in order to provide appropriate context, suggest additional language be included in this section or referencing table 4.1.15-6, noting the population of off-island construction workers and their expected temporary Workforce Housing needs required for the buildup. (Comment ID - 925:ACD)

# Socioeconomics

## Summary of DON Responses:

- The estimates that were made using the IMPLAN model do not include estimates of costs to GovGuam. Costs to GovGuam are estimated in terms of additional key professional staff required at agencies that would be directly impacted by the proposed action. Also, additional information on costs to GovGuam, in dollars terms, has been added to Section 4.1.15.2. (Comment ID - 925:ACA)
- Additional context on temporary workforce housing requirements is presented in the Socioeconomic Impact Assessment Study (Appendix D to the SEIS), in Section 4.3.3.4. (Comment ID - 925:ACD)

# Socioeconomics

## Summary of DOI Concerns:

- Gross Island Product is described in this section, though the DOI Office of Insular Affairs in partnership with the DOC Bureau of Economic Analysis established Guam Gross Domestic Product Estimates. The initial estimates cover 2002-2010, and in 2013 BEA released GDP estimates for 2011 and 2012. May seek to include or reference appropriate data in this section, see [http://www.bea.gov/national/gdp\\_territory.htm](http://www.bea.gov/national/gdp_territory.htm) (Comment ID - 925:ACE)

# Socioeconomics

## **Summary of DON Response:**

- Gross Domestic Product estimates for 2002-2010, that are referenced in your comment, are used in Section 4.1.15.2 as the basis for projecting the Gross Island Product baseline (See Figure 4.1.15-6). (Comment ID - 925:ACE)

# Socioeconomics

## Summary of DOI Concerns:

- Agencies Affected by Development outlines Guam Agencies with permitting/monitoring duties; additional consultation with the Government of Guam may assist in identifying additional agencies that without appropriate staffing could result in delay of buildup. Agencies like Guam Department of Parks should be considered given expected impacts discussed on 4-7137 and agency's role in regulation to address conflict of ocean-based tourism. Similar consideration should be given to the Guam Department of Revenue and Taxation as it is responsible for tax enforcement, issuance of driver's licenses, vehicle registration, and business licenses. (Comment ID - 925:ACF)

# Socioeconomics

## **Summary of DON Response:**

- Based on the findings of the Socioeconomic Impact Assessment Study, a significant impact to Guam public services has been identified in the SEIS. The scope of the Socioeconomic Impact Assessment Study was partly influenced by coordination with agencies and their availability to participate in the study. While the Socioeconomic Impact Assessment Study may not have focused on every agency by name, proposed mitigations related to public services would not be limited solely to those agencies that are analyzed in the Socioeconomic Impact Assessment Study and SEIS. (Comment ID - 925:ACF)

# Marine Transportation

## Summary of DOI Concerns:

- As noted in Table 2.2-4 what approach will be used to remove vessels that unknowingly or intentionally enter SDZ during firing practice? (Comment ID - 925:AM)
- The impact of the SDZ at Ritidian and Pagat on shipping lanes should be discussed in the Final SEIS. (Comment ID - 925:AZ)
- The marine transportation/recreation use of the sea areas within the SDZ of Alt.5 LFTRC would be critically impacted by implementation of this proposed LFTRC. Intentional and unintentional use of these waters in the SDZ for their support of excellent diving, fishing and even canoeing, including the Guam Northern Passage canoe event, would present conflict with the firing range use. How will customary users be kept out of these waters? (Comment ID - 925:AAX)

# Marine Transportation

## Summary of DON Responses:

- The surface danger zone encompasses nearshore and offshore waters. Access to these areas would be restricted during training operations. The DON would provide the proposed training schedule to the U.S. Coast Guard who would issue and broadcast a Notice to Mariners that will identify the location of the surface danger zone and direct vessel operators to navigate clear of the surface danger zone. Additionally, range lookouts would scan the surface danger zone prior to and during live fire training to ensure that there are no vessels within or approaching the surface danger zone. (Comment ID - 925:AM)
- Potential impacts on shipping lanes from the surface danger zones associated with Alternatives 1 and 5 are discussed in Sections 5.1.13.2 and 5.5.13.2, respectively. (Comment ID - 925:AZ)
- Significant adverse impacts to land use were identified in Section 5.5.6, Land and Submerged Land Use due to the new restrictions on public access to submerged lands under the Northwest Field LFTRC. The text of Section 3.6, Affected Environment and Figure 3.6.1-1 were edited to include fishing areas, including Fish Aggregating Devices. The recreational and sociocultural impacts of the new public access restrictions on fishing are described in Sections 5.5.7 and 5.5.15, respectively. Access to Rota Bank and all but one Fish Aggregating Device, located northeast of Guam, would be unaffected by the Northwest Field LFTRC Alternative 5. There are fishing areas within the surface danger zone that would not be accessible to the public during training. The DON would provide the proposed training schedule to the U.S. Coast Guard who would issue and broadcast a Notice to Mariners that will identify the location of the surface danger zone and direct vessel operators to navigate clear of the surface danger zone. The use of the recreational resources would be restored surface danger zones during non-training periods. (Comment ID - 925:AAX)

# Nearshore Waters

## **Summary of DOI Concerns:**

- The NPS would like to see a model of the potential impacts from lighting at the proposed Finegayan housing component on night sky values along the west side of Guam and especially at Asan Beach and Asan Bay Overlook. (Comment ID - 925:AAC)

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## **Summary of DON Responses:**

- *A model of potential impacts from lighting is not required unless significant impacts are expected. Additionally, the Preferred Alternative has been revised from the Draft SEIS to place the housing at Andersen AFB. Therefore, a lighting study at Finegayan is not required.*

# Land and Submerged Land Use

## Summary of DOI Concerns:

(Comment ID - 925:AAD)

- Will the DoD Economic Adjustment Committee develop the implementation plan for support of non-DoD infrastructure on Guam before the Final SEIS and ROD?

## Summary of DON Responses:

- *DoD would assist GWA in identifying funding and Congress directed the SecDef to convene the EAC in part to develop an implementation plan (submitted to congress NLT the date of the ROD) to address assistance to support public infrastructure for the preferred alternative*
- *This plan is being coordinated by all pertinent federal agencies and will detail work, cost, and a schedule for completion of construction, improvements, and repairs to non-military utilities/facilities*

*Section 8102 of the FY2014 Consolidated Appropriations Act appropriated \$106.4 million for civilian water and wastewater improvements on Guam.*

*Funding remains available until expended.*

# 2012 Roadmap Adjustments

## Summary of DOI Concerns:

- How will the Joint Region Marianas Public Access Plan be updated to incorporate the 2012 Roadmap Adjustments to the military relocation on Guam? (Comment ID - 925:AF)
- What is the potential to have major changes again to this proposed build-up before its implementation, for example, if the redeployments to Australia and Hawaii are not able to proceed or if Japan changes plans for US bases in-country if Japanese defense needs change? (Comment ID - 925:AG)

# 2012 Roadmap Adjustments

## Summary of DON Responses:

- DoD is in the process of developing a Public Access Plan for non-DoD personnel to access DoD lands. Comments from the public were sought for this plan in July, 2014. It is the intent of DoD to maintain public access to DoD lands that contain cultural/historical sites consistent with safety and operational requirements. Access will be granted at approved times such as when lands are not being used for military training. For this SEIS, final plans concerning access to areas potentially impacted by the proposed action have not been developed. DoD looks forward to working with stakeholders to develop plans for cultural stewardship and access that balances operational needs, public safety concerns and the continuing public use and enjoyment of these resources. (Comment ID - 925:AF)
- The potential for any such events to occur, and the degree to which they would affect the proposed action or the SEIS are unknown. In any case, the DON is committed to an open and transparent process in the relocation of U.S. Marine Corps forces to Guam and is committed to conducting a thorough assessment of environmental impacts. (Comment ID - 925:AG)

# 2012 Roadmap Adjustments

## Summary of DOI Concerns:

- The Final SEIS must discuss how the proposed actions fulfill formal plans (not the “Roadmap Adjustments”) for US military re-alignment in the Western Pacific and East Asia. How does the change from actions in the 2010 EIS, such as redeployment of Marines to Australia and Hawaii, fulfill such formal plans? Are EISs being drafted for impacts at those other redeployment sites? (Comment ID - 925:AH)

# 2012 Roadmap Adjustments

## Summary of DON Responses:

- NEPA requires the identification and evaluation of environmental impacts of a proposed action and alternatives, and does not require an assessment of how proposed actions fulfill any agency's plans. The purpose and focus of this SEIS is to identify and evaluate the potential impacts of the 2012 Roadmap Adjustments for the military relocation on Guam. The study area for the direct and indirect impact analysis is limited to land and submerged lands of Guam and does not extend to CNMI, Australia, Hawaii, or any other location. The cumulative effects study is limited to Guam and specifically excludes the CNMI because there is no proposed action for the CNMI in this SEIS. Cumulative Effects Section 7.5 describes the recent and ongoing DoD NEPA documents. The Mariana Islands Testing and Training EIS/Overseas EIS and the Mariana Islands Training Range Complex Airspace Environmental Assessment are addressed in the cumulative effects section, but only those aspects that are relevant to the Guam land and submerged land study area. Other DoD actions are listed in Section 7.5 as being outside the SEIS study area. Those other actions are subject to their own environmental planning requirements under NEPA or E.O. 12114, as appropriate. (Comment ID - 925:AH)

# LFTRC

## **Summary of DOI Concerns:**

- Table 2.2-4 and associated text on page 2-9 does not explain range usage, just ammunition usage at the range. Clarify whether 39 weeks of use means seven days/week usage (including two nights), or would it be only five days per week as discussed in the 2010 FEIS? Or does it mean the equivalent of 273 days/year, using it five to six days per week all year? Complete Table 2.2-4 to include the information provided in the 2010 Final EIS, Vol 2, page 2-57, Table 2.3-2, columns 3-6 "Typical Use Estimates" and Note (a). (Comment ID - 925:AJ)
- Why are alternative sites to the Hand Grenade range at Andersen South not considered? (Comment ID - 925:AAP)

# LFTRC

## Summary of DON Responses:

- The SEIS describes the proposed training tempo as up to 39 weeks per year (Marine Corps and non-Marine Corps use) with 13 weeks of non-availability per year for weather, maintenance, and holidays. The range use schedule during any given month or week would be dependent on training requirements and other variables that are subject to change.  
(Comment ID - 925:AJ)
- Text has been added to Chapter 2 in the Final SEIS to describe the criteria and rationale applied to the identification of hand grenade range alternatives. Other locations on Guam besides Andersen South were evaluated and removed from further consideration in the 2010 Final EIS. Operationally, the hand grenade range is more compatible with the training activities conducted at Andersen South than at the pistol/rifle ranges of the proposed LFTRC. Lastly, the proposed location within Andersen South was identified based on a process involving GIS overlay of noise contours and other training operations to minimize noise impacts outside the property and to maximize compatibility with other Andersen South training activities.  
(Comment ID - 925:AAP)

# LFTRC

## **Summary of DOI Concerns:**

- Is the Alternative 5 LFTRC site next to, but not at, Northwest Field?  
(Comment ID - 925:AAS)
- Are impacts from the LFTRC – Alternative 5, to the US Coast Guard navigation facility, the private telecommunications repeater station and Anderson AFB Milky Way facility on the Ritidian cliff line discussed?  
(Comment ID - 925:AAT)
- For LFTRC Alternatives 2 to 4, especially Alt. 3, the risk of wildfire could increase and fires could spread from Naval Magazine into remote areas of the national park at Mt. Alifan. This could lead to loss of vegetation, soil and native animals and would expose ground artifacts to looters or illegal collectors because of the loss of vegetation cover.  
(Comment ID - 925:ABC)

# LFTRC

## Summary of DON Responses:

- The Final SEIS introductory paragraph for Section 5.5 has been revised to state that the Northwest Field LFTRC Alternative 5 location is north of the actual Northwest Field airfield but that “Northwest Field” is used in the SEIS to describe this location. There were no edits made to the names used in the SEIS.(Comment ID - 925:AAS)
- Operational conflicts between the proposed action and other federal facilities on Guam are subject to de-confliction via internal coordination between agencies and are not addressed in the SEIS. (Comment ID - 925:AAT)
- A Range Fire Management Plan would be prepared as a Best Management Practice (see Section 2.8 of the SEIS) as part of the proposed action (all alternatives), to reduce fuel loads and fire potential on proposed ranges and thereby reduce the risk of a fire occurring as a result of range use [...] DON cannot definitively state that fire from range activities would not be possible, but Range Fire Management Plans are very successful at minimizing the risk of fires and providing for rapid response to extinguish a fire before it can spread off the range. The Terrestrial Biological Resources sections of the SEIS assess the potential for impacts from fire on biological resources as they relate to the proposed action and alternatives.(Comment ID - 925:ABC)

# LFTRC

## **Summary of DOI Concerns:**

- As range utilization depends on the number of personnel required to complete annual individual training events; what percentage of UDP and PCS personnel are expected to use the LFTRC to complete their annual training events? Is it expected that all of the UDP will use the LFTRC for their annual training events, or would they have addressed those annual requirements at other locations outside of Guam before they serve their 3- month rotation in Guam? Inquiry made to understand better the impact on use of training ranges and non-availability of ranges. Inclusion of such information may be beneficial to include in Final SEIS to provide greater transparency on range utilization. (Comment ID - 925:ABT)

# LFTRC

## **Summary of DON Response:**

- Section 2.2.3, Live-Fire Training Range Complex describes the training tempo as “39 weeks per year (Marine Corps and non-Marine Corps use).” Marine Corps training requirements are dictated by current training and readiness manuals and Marine Corps Orders, which collectively outline the minimum proficiency levels required of Marine Corps personnel and the appropriate training conditions to develop, evaluate, and maintain that proficiency. The training tempo described in the SEIS is based on best available information regarding range requirements. The range use schedule during any given month or week would be dependent on training requirements and other variables that are subject to change. (Comment ID - 925:ABT)

# LFTRC

## **Summary of DOI Concerns:**

- The maps depicting firing points and surface danger arcs for the firing range on NW Field depict the Closed Population Facility as being outside of the active firing area. However, DOD representatives have stated that access to the facility cannot be guaranteed when the firing range is active. USGS requires 24 hour/7 days per week access to the Closed Population facility. If access cannot be guaranteed because of new DOD activities or new security measures in the adjacent firing range, then the facility will need to be placed elsewhere on Guam at a location with long-term guaranteed access. (Comment ID - 925:ABI)

# LFTRC

## **Summary of DON Response:**

- Access to the Closed Population Facility will be granted at approved times such as when lands are not being used for military training. Upon entering an operational phase, coordination of specific dates for range usage would be scheduled by Range Operations. With appropriate coordination and in accordance with DoD security protocols, the DON would allow research and monitoring of biological resources by local, university, and federal researchers. Therefore, the area would remain functional to serve its intended research and conservation role.  
(Comment ID - 925:ABI)

# Tinian

## **Summary of DOI Concerns:**

- The draft SEIS (Section 1.2 Scope of this SEIS) notes that the 2010 decisions regarding training ranges on Tinian remains final and are not subject to reanalysis in the SEIS, though the Department of Navy has deferred implementation of the Tinian training ranges from the 2010 ROD pending the outcome of the on-going CNMI Joint Military Training EIS (CJMT EIS). Will the EAC be responsible for addressing necessary infrastructure, roads, and facilities accounted for in the on-going CJMT EIS in a manner similar to Guam? (Comment ID - 925:ABS).

# Tinian

## Summary of DON Response:

- The study area for the direct and indirect impact analysis is limited to land and submerged lands of Guam and does not extend to CNMI. The cumulative effects study is limited to Guam and specifically excludes the CNMI because there is no proposed action for the CNMI in this SEIS. The decision regarding the military's future use of Tinian for training (which is being evaluated in the CNMI Joint Military Training EIS/Overseas EIS) could supercede the 2010 Record of Decision with regards to Tinian range projects. Cumulative Effects Section 7.5 describes other relevant DoD NEPA documents. The Mariana Islands Testing and Training EIS/Overseas EIS and the Mariana Islands Training Range Complex Airspace Environmental Assessment are addressed in the cumulative effects section, but only those aspects that are relevant to the Guam land and submerged land study area. The Economic Adjustment Committee established by Executive Order 12788 (as amended), coordinates Federal interagency and intergovernmental assistance to support the Defense Economic Adjustment Program and help communities respond to economic impacts caused by significant Defense program changes. (Comment ID - 925:ABS)

# Finegayan Impacts

## Summary of DOI Concerns:

- The selection of Finegayan for the main cantonment facility family housing would result in impacts to Refuge lands and habitat for listed and candidate species from construction and operation and would directly impact 1,249 acres of Overlay Refuge lands. Similarly, the proximity to biologically-sensitive areas in the Haputo Ecological Reserve Area would lead to adverse impacts to multiple rare-species and candidate species. The Service recommends more consideration for Barrigada (Alternative D). In addition, the USFWS is concerned that the proposed mitigation would not compensate for the loss of habitat and ecological functions of the areas cleared. (Comment ID - 925:R)

# Finegayan Impacts

## Summary of DON Response:

- Based on comments received during the public comment period, a new preferred alternative has been identified that would result in fewer impacts to Service's trust resources. Under the new preferred alternative, 220 fewer acres of Overlay Refuge and 179 fewer acres of recovery habitat would be impacted. Extensive mitigation and conservation measures are proposed as part of the action. These conservation measures focus not only on forest enhancement, but also on invasive and non-native species eradication (predator control), public education, and brown tree snake research and suppression. This multi-pronged approach will address all the stressors and limiting factors challenging the eventual recovery of the listed species on Guam. (Comment ID - 925:R)

# Cumulative Impacts

## Summary of DOI Concerns:

- This Draft SEIS does not address the transient aircraft carrier berthing in Apra Harbor or the Army Air and Missile Defense Task Force (AAMDTF) deployment that were addressed in the 2010 Final EIS. Those projects may be independent of the SEIS proposed action, but if implemented these will greatly increase the cumulative effects of the military build-up on Guam. Likewise proposed developments for Marines training on Tinian and Pagan could have an impact on related support facilities and actions on Guam and these should be estimated and addressed in the Final SEIS under cumulative impacts. (Comment ID - 925:ABE).
- We are informed that a legal impediment exists for Alternative 5 and strongly recommend discussions continue between Department of Defense and the Department of the Interior's Fish and Wildlife Service and Office of the Solicitor. (Comment ID - 925:ACG).

# Cumulative Impacts

## Summary of DON Responses:

- The study area for the direct and indirect impact analysis is limited to land and submerged lands of Guam and does not extend to CNMI. The cumulative effects study is limited to Guam and specifically excludes the CNMI because there is no proposed action for the CNMI in this SEIS. The decision regarding the military's future use of Tinian for training could supercede the 2010 Record of Decision with regards to Tinian range projects. Cumulative Effects Section 7.5 describes other relevant DoD NEPA documents. The Mariana Islands Testing and Training EIS/Overseas EIS and the Mariana Islands Training Range Complex Airspace Environmental Assessment are addressed in the cumulative effects section, but only those aspects that are relevant to the Guam land and submerged land study area. (Comment ID - 925:ABE).
- Such coordination will continue in parallel with the NEPA process. (Comment ID - 925:ACG).

# Mitigation Considerations

## Summary of DOI Concerns:

- The USFWS recommends that the Final SEIS contain clear links between the value of habitat to be impact, impacts from construction and operations and proposed mitigation. Many of the identified mitigation measures lack assurance and specificity, including in regards to habitat and forest replacement, impacts to the Mariana common moorhen and in regards to the implementation itself, not the proposal of. The USFWS ability to implement its mission in regards the recovery and maintenance of of endangered species would be inhibited and mitigation needed to offset these impacts is not made clear. Lastly, compensatory mitigation to make an incompatible use compatible is against USFWS policy. (Comment ID - 925:U)

# Mitigation Considerations

## **Summary of DON Response:**

- DON has reinitiated Endangered Species Act section 7 consultation with the U.S. Fish and Wildlife Service and specific mitigation measures and locations have been included in the associated Biological Assessment (Appendix X of the Final SEIS) addressing impacts with implementation of the preferred alternative. (Comment ID - 925:U)

# Wrap-up and Next Steps

- Recap
- NOA of Final SEIS Jan - Feb 2015
- ROD Spring 2015

# Backup